

REMARKS

Applicants respectfully request reconsideration of this application as amended. Claims 2-5 and 10-19 have been amended. Claims 6-9 have been cancelled without prejudice. Claims 20-23 have been added. Therefore, claims 1-5 and 10-23 now are presented for examination.

35 U.S.C. § 103 Rejection

Claims 1-19 are rejected under 35 U.S.C. §103(a) as being unpatentable over Newman et al., U.S. Patent No. 6,154,600 (“Newman”) in view of Liaguno et al. et al., U.S. Patent No. 5,729,741 (“Liaguno”).

Applicants respectfully submit the Newman discloses “[a] non-linear editing system for home audio and video applications . . .” (abstract, lines 1-2). Newman further discloses that the editing system uses “a graphical user interface [GUI] useful for the capture of hypermedia. In capture mode, the capture GUI preferably *includes a shot tab 404 [and] displaying icons 406 representing previously captured clips*. The capture GUI likewise includes a display window 408 to display an image from a clip referenced by a selected icon 410.” (col. 14, lines 40-48; emphasis provided).

Liaguno discloses “[a]n integrated media image information storage and retrieval system [that] processes information supplied by different types of media.” (abstract, lines 1-3).

In contrast, claim 1, in pertinent part, recites “converting the annotations into searchable annotations organized as hierarchical shot clusters using a voice-to-text conversion system.” (emphasis provided). Applicants respectfully submit that neither Newman nor Liaguno, individually or combined, teach or reasonably suggest such a feature. The Examiner has indicated in an Office Action mailed, March 31, 2005, that

“[r]egarding the annotations organized as hierarchical shot cluster, Newman does disclose *ranking/grouping (i.e. hierarchical) the media based upon the event/scene* (i.e. GreekCity, Forest, Horse, Lightening, etc.) (see Fig 9).” (Office Action, mailed March 31, 2005, page 4, lines 4-7; emphasis provided). Applicants respectfully disagree with the Examiner’s characterization of Fig. 9 in Newman. Fig. 9 in Newman shows “displaying icons 406 which *represent previously captured clips*.” (col. 14, lines 45-46 and Fig. 9, 406; emphasis provided). The display icons 406 are thus not used for ranking/grouping, as indicated by the Examiner, but are instead used to show what clips are available to the user. Additionally, the names GreekCity, Forest, Horse, Lightening, etc. under each clip are for labeling purposes only. (see col. 14, lines 40-64, and Fig. 9). Accordingly, for at least the reasons stated above, Applicants respectfully request the withdrawal of the rejection to claim 1 and its dependent claims.

Claims 10 and 16 contain limitations similar to those of claims 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claims 10 and 16 and their dependent claims.

New Claims

New independent claim 20 contains similar limitations to those of claim 1. Claims 21-23 depend from claim 20. Accordingly, Applicants respectfully submit that claims 20-23 are distinguished over the cited references.

Conclusion

In light of the foregoing, reconsideration and allowance of the claims is hereby earnestly requested.

Invitation for a Telephone Interview

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Request for an Extension of Time

Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

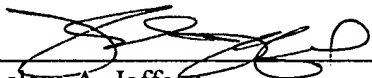
Charge our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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